

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., <i>et al.</i> ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that the undersigned counsel hereby enters their appearance for Vestar DRM-Opc LLC, QCM Partners, LLC, CPT Riverside Plaza, LLC, Vestar Best in the West Property, LLC, Santan MP, LP, and Square One Partners, LLC (collectively, the “Landlords”), pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. 101, *et seq.*, Rule 9010(b) of the Federal Rules of Bankruptcy Procedure in the above-captioned, jointly administered bankruptcy cases.

FURTHER, PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy Procedure and Rule 2002-1(b) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of Delaware, the undersigned requests that all notices and all other papers required to be served in this case be served upon the following persons and that the following persons be added to the mailing matrix in this case:

Karen M. Grivner
CLARK HILL PLC
824 N. Market Street, Suite 710
Wilmington, Delaware 19801
Telephone: (302) 250-4750
Facsimile: (302) 421-9439
kgrivner@clarkhill.com

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Audrey L. Hornisher
Tara L. Bush
CLARK HILL PLC
901 Main Street, Suite 6000
Dallas, Texas 75202
Telephone: (214) 651-4300
Facsimile: (214) 651-4330
ahornisher@clarkhill.com
tbush@clarkhill.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service, nor any subsequent appearance, pleading, claim or suit, is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural right of the Landlords including, without limitation: (a) the right to have final orders in non-core matters entered only after *de novo* review by a federal district court judge; (b) the right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (c) the right to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretionary withdrawal; (d) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the district court, or (e) any other rights, claims, actions, defenses, setoffs, or recoupment to which the Landlords are or may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Landlords expressly state otherwise, the Landlords do not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: January 22, 2025

CLARK HILL PLC

By: /s/ Karen M. Grivner

Karen M. Grivner (Bar No. 4372)
824 N. Market Street, Suite 710
Wilmington, Delaware 19801
Tel: (302) 250-4750
Fax: (302) 421-9439
kgrivner@clarkhill.com

-and-

Audrey L. Hornisher (TX Bar No. 24094369)
Tara L. Bush (TX Bar No. 24122050)
901 Main Street, Suite 6000
Dallas, Texas 75202
Tel: (214) 651-4300
Fax: (214) 214-651-4330
ahornisher@clarkhill.com
tbush@clarkhill.com

*Attorneys for Vestar DRM-Opc LLC, QCM
Partners, LLC, CPT Riverside Plaza, LLC,
Vestar Best in the West Property, LLC,
Santan MP, LP, and Square One
Partners, LLC*